

United States Bankruptcy Court
Eastern District of Texas
Sherman Division

In re:
Empire Countertops, LLC
1137 Enterprise Dr.
Pilot Point, TX 76258
EIN: 45-1145076

Case No. 22-41686-btr

Chapter 11

Expedited Hearing Requested

Debtor

**MOTION FOR EXPEDITED HEARING ON DEBTOR'S NOTICE
AND MOTION TO CONVERT CASE FROM CHAPTER 11 TO CHAPTER 7**

Empire Countertops, LLC ("Empire") files this *Motion for Expedited Hearing* on its motion to *Motion to Convert Case from Chapter 11 to Chapter 7* (Dkt. 86), and would respectfully show the following:

1. Empire asks that a hearing be set not later than 2:30 p.m. on Wednesday, March 22, 2023, for approximately thirty minutes for the Court to consider Empire's Motion to Convert Case from Chapter 11 to Chapter 7 (Dkt. 86). Empire has ceased operations and requests that a chapter 7 trustee be appointed as soon as practical to begin the liquidation and administrative process of the estate.
2. Notice of the proposed expedited hearing will be provided to all parties receiving notice via the Court's ECF system. Additionally, Empire will provide notice of the proposed expedited hearing to the U.S. Trustee and the debtor's creditors matrix. Such notice is sufficient because all parties in interest will have received notice and this request is at least seven days prior to the requested hearing date.
3. Empire asks that the expedited hearing be conducted telephonically for the convenience of creditors and their counsel.

4. A hearing was not requested earlier because the motion for conversion was filed on March 13, 2023.

DATED: March 14, 2023.

Respectfully submitted:

NORRED LAW, PLLC

By: /s/ Clayton L. Everett
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Counsel for Debtor

CERTIFICATE OF CONFERENCE

I certify that I contacted John Vardeman at the Office of the U.S. Trustee regarding this expedited motion and the underlying motion. He indicated that he is not opposed to the relief requested.

By: /s/ Clayton L. Everett

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this Motion for Expedited Hearing and accompanying Motion shall be served on the Office of the U.S. Trustee, upon the parties receiving notice via the Court's CM/ECF system, and upon the master mailing list. A copy of the completed certificate of service will be attached upon service.

/s/ Clayton L. Everett
Clayton L. Everett